

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-Intervenors,	§	
	§	
and	§	
	§	
STATE OF NEW JERSEY,	§	
	§	
Defendant-Intervenor.	§	

**DEFENDANT-INTERVENORS'
MOTION TO WITHDRAW JACK SALMON AS COUNSEL**

Defendant-Intervenors Karla Perez, *et al.*, respectfully move to withdraw Jack Salmon as an attorney in this case. Mr. Salmon will be ending his employment with the Mexican American Legal Defense and Educational Fund (MALDEF) on April 5, 2019. His withdrawal will not cause undue delay and will not adversely affect the interests of Defendant-Intervenors Karla Perez, *et al.*

Defendant-Intervenors Karla Perez, *et al.*, will continue to be represented by Attorney-in-charge, Nina Perales, and attorneys Alejandra Avila, Ernest Herrera, Denise Hulett, Priscila Orta

(MALDEF), Douglas H. Hallward-Driemeier (Ropes & Gray), Carlos Moctezuma García (García & García Law Firm).

For these reasons, Defendant-Intervenors Karla Perez, *et al.*, respectfully request leave to withdrawal Jack Salmon as counsel in this case.

Dated: April 5, 2019

Respectfully Submitted

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on April 5, 2019, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Jack Salmon
Jack Salmon